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LETTER AND U S NAVY RESPONSE TO U S EPA COMMENTS ON DRAFT FEDERAL
FACILITIES AGREEMENT SITE MANAGEMENT PLAN 2013 NAS PENSACOLA FL
10/1/2012
U S NAVY

**Response to comments for USEPA's Comments on the
2013 Draft Site Management Plan
Naval Air Station Pensacola
Received October 1, 2012**

This review is divided into two parts; a review of the text and tables of the SMP itself and then a review of the Appendix Milestone schedule concurrently with the Exit Strategy and the Schedule (9-14-12).

Part 1: Review of the SMP text and Tables

1. **Section 2.4, Active Operable units, OU 4:** The last sentence should be deleted as it appears to be part of the site discussion which EPA is awaiting the Navy response. As further clarification, the previous MCL of 50ppb is outside EPA's risk range and therefore the use the current standard of 10 is required. There must be a decision document that specifies the new cleanup level for arsenic. At a minimum, ESD should be issued to reflect the change in cleanup level and indicate whether existing remedy is expected to address the arsenic in GW. This may require modification to remedy if not.

Response: The last sentence of the OU 4 paragraph, Section 2.4, Page 2-6: "Consistent with USEPA policy, if the existing remedy is still within the accepted risk range even considering this new Maximum Contaminant Level (MCL), then no site remedy modification will be needed (or need to be documented) because the remedy is still protective." has been removed.

2. **Section 2.4, Active Operable units, OU 16:** The description should be a bit more specific considering the efforts this fiscal year.

Response: The text has been expanded as follows: "The OU 16, Site 41 draft Feasibility Study was submitted to the regulatory agencies in CY2010. However subsequent analysis by the NAS Pensacola Partnering Team indicated the need for better characterization of the vertical and horizontal spatial extent of contaminants and the refined risks in sediment at nine of the wetlands at the facility. The wetlands requiring the additional work include: wetlands 1B, 4D, 5A, 12, 15, 18A, 18B, 48, and the 64 complex. The Navy agreed to complete a RI addendum specific to these wetlands and initiated a UFP SAP for the investigation."

3. **Section 2.4, Active Operable units, OU19:** The description should be updated.

Response: The text has been modified as follows: "OU 19, Site 44 was formerly in Informal Dispute due to concerns over the Monitored Natural Attenuation (MNA) remedy for groundwater that was selected in the draft final Proposed Plan. The Informal Dispute was resolved on September 14, 2012 with the approval of the OU 19, site 44 Feasibility Study Addendum Work Plan (UFP SAP). Additional groundwater data collection has been initiated and will be included in the Feasibility Study Addendum to be completed in calendar year 2013."

4. **Section 2.4.1, Additional Significant Items, first paragraph:** The paragraph mentions “recent requests” from EPA and “NCP acknowledge concept of freezing ARARs...” EPA made these requests during the last discussion of the SMP which is not recent. In addition, since the ARAR (arsenic) is no longer protective the remedy is no longer protective and the remedy must be appropriately addressed. These types of discussions are best addressed through the work at the site and not in the SMP. The phrase should be deleted or revised.

Response: The text has been modified as follows: “As indicated above, the promulgated MCL for arsenic in groundwater has been reduced. Based on a request from USEPA, the Navy agreed to work towards developing an acceptable strategy for how the NAS Pensacola Partnering Team will assess, as needed, the continued protectiveness of sites at the facility where arsenic releases to groundwater have been previously identified.”

5. **Section 2.4.1, Additional Significant Items, second paragraph:** The paragraph mentions that remedial construction activities were previously completed and that interim RACRs were not required. Interim RACRs were required at the time of the completions; however, they were not completed. EPA is requesting that they be completed to bring the site up-to-date. These types of discussions are best addressed through the work at the site and not in the SMP. The phrase should be deleted or revised.

Response: The text was modified as follows:” In addition the USEPA has requested that interim Remedial Action Completion Reports (RACR) be completed for groundwater remedial construction activities for sites with ongoing groundwater monitoring activities including OU 1, OU 2, OU 4, OU 11 and OU 13. Given that the remedial construction activities are currently ongoing for OU 2 and OU 11, the interim RACR will be completed when groundwater monitoring construction activities are completed. For OU 1, OU 4 and OU 13 remedial construction activities were previously completed and an Interim RACR for groundwater was not completed. The Navy will initiate the RACR as funding become available.”

6. **Site Description Chart, Table 1, PSC 1:** The ROD was completed in 1998 and construction activities have been completed for some time. It is suspected that the site is in Long-Term Remedial Action (LTRA) which begins once the interim RACR is completed. This will allow the site to be considered complete until the remedial action goals are achieved. The regulatory status should reflect the current phase. This particular comment would appear to be appropriate for other PSC’s, as well.

Response: The regulatory status has been changed to “Long-Term Remedial Action (LTRA)”.

7. **Site Description Chart, Table 1, PSC 7:** Please explain whether any sampling was ever performed at the site. Fire Training areas are notorious for operations that cause significant groundwater

issues. It is unclear whether a preliminary screening program would provide the level of scrutiny that would detect the contamination from these types of activities. In the response to these comments, please clarify the PSCR activities that ensured no further action is required at this site. Additional language should be included in the description to complete the thought process of whether the site is protective.

Response: The text has been changed as follows: “The firefighting training school in Building 1713 has been in operation since 1940. Training that involved gasoline fires (and perhaps other flammable liquids) in open tanks of water reportedly occurred west of Building 1713. The presence of a clearing and firefighting tower east to southeast of Building 1713 suggests there was training conducted in those areas as well. There is no evidence of hazardous waste disposal or threat to human health or the environment. A PSC was conducted in 1996 to determine if contaminants were present in onsite soils and groundwater above the PRGs. Soil and groundwater samples were collected and analyzed for TCL and TAL parameters. Aluminum, arsenic, and iron exceeded soil PRGs and aluminum and iron exceeded secondary standards in groundwater. No organic constituents were detected above the PRGs in either soil or groundwater. The detected metals in groundwater were less than the NAS Pensacola reference concentration. A time critical soil excavation and offsite disposal remedial action was completed by the Navy in 1998 to remove the soil containing arsenic concentrations exceeding PRGs. The regulatory agencies approved NFA.”

8. **Site Description Chart, Table 1, PSC 8:** It is unclear what the site’s ROD recommended and whether the site is being investigated in the MMRP program. Please revise the description.

Response: The text has been changed as follows: “PSC 8, also referred to as Site 8 or OU 13 is a rifle range disposal area and is located in the area now occupied by Building 3561, which houses the NAS Pensacola Public Works Center (PWC) Maintenance/Material Department. This building covers an area approximately 550 feet by 163 feet. Surrounding the building is an asphalt parking lot on the eastern, western, and northern sides of the building. Along the southern side of the building lies a small grassy area. This area was reportedly used for the disposal of solid waste (primarily paper) from NAS Pensacola between 1951 and 1955, and disposal was accomplished by burning and burial. PSC 8 is surrounded by chain-link fencing. The site is not part of the Navy’s MRP program. In 2004 and 2005 the Navy completed an Interim Removal Action for soils contaminated with cadmium and dieldrin. The ROD, completed in 2006, specified that the Site 8 soils did not pose a risk but groundwater concentrations exceeded Remedial goals and MNA and LUCs were the selected remedy.”

9. **Site Description Chart, Table 1, PSC 18:** An IAS (acronym undefined) assumed that “no immediate cleanup effort was conducted.” The statement suggests that a cleanup effort is needed except for the PSCR being no further action. Please add a statement that allowed the change in site status from 1966 to 2000.

Response: The text has been modified as follows: "In 1966, a transformer at Substation A (located south of North Avenue and west of Center Avenue) reportedly failed, spilling approximately 50 gallons of transformer oil containing an unknown concentration of PCBs on the small gravel-covered area along the northeast side of substation A. It is assumed in the Initial Assessment Study (IAS) that no immediate cleanup effort was conducted. A Preliminary Site Screening Investigation was completed in 1996 and a time critical soil excavation and offsite disposal remedial action was completed by the Navy in 1998 to remove the soil containing PCB concentrations exceeding PRGs. The regulatory agencies approved NFA."

10. **Site Description Chart, Table 1, PSC 28:** The sites description relates transformer oil being spilled with possible PCBs washing into a nearby storm drain. The 1997 PSCR is NFA. It is unclear whether a preliminary screening program would provide the level of scrutiny that would detect the contamination from these types of activities. In the response to these comments, please clarify the PSCR activities that ensured no further action is required at this site. Additional language should be included in the description to complete the thought process of whether the site is protective.

Response: The text has been modified as follows: "In 1969, a transformer fell from a truck traveling on Radford Boulevard, just north of Building 632. The transformer broke open and spilled approximately 50 gallons of transformer oil onto the pavement. At that time it was not known whether the oil contained PCBs. The oil was reportedly washed into a nearby storm sewer drain. A Preliminary Site Screening Investigation was completed in 1996 and a time critical soil excavation and offsite disposal remedial action was completed by the Navy in 1998. The regulatory agencies approved NFA."

11. **Site Description Chart, Table 1, PSC 29:** The site description suggests that the types and extent of contamination are unknown. Since a ROD was completed it is expected that this statement is no longer true. In the response to these comments, please clarify the site activities that ensured no further action is required at this site. Additional language should be included in the description to complete the thought process of whether the site is protective.

Response: The text has been modified as follows: "In 1981, workers excavating soil beneath the concrete apron south of Building 3460 received skin burns from a "black slimy liquid" in the soil. Types of chemicals involved and extent of contamination are unknown. A leak in the nearby industrial sewer line from the Naval Aviation Depot facility was the expected source. A RI was conducted in 1994 that identified manganese, dieldren and PAH contaminated soils. In 1995 an Interim Removal Action was completed to remove and properly dispose of 422 cubic yards of contaminated soil. The ROD was completed in 1999 with the selected remedy of No Action. The ROD indicated: Because hazardous substances do not remain onsite, the five year review does not apply."

12. **Site Description Chart, Table 1, PSC 34:** The site description has contamination being carried off-site. The site is only listed as NFA. In the response to these comments, please clarify the site activities that ensured no further action is required at this site. Additional language should be included in the description to complete the thought process of whether the site is protective.

Response: The Table text has been modified as follows: "During May 1984, a leak occurred in a pipeline at the north end of Building 3557. The leak reportedly resulted in the loss of solvent detergent used for cleaning aircraft. The solution contained 1.7 percent chlorinated aromatic hydrocarbons solvent. A field investigation was completed at Site 34 and soil contaminated with naphthalene and lead was identified, excavated and properly disposed of offsite. Naphthalene was detected in an onsite groundwater sample but was not detected in downgradient groundwater samples. Based on the soil removal it was expected that the limited area of elevated naphthalene detected in groundwater would naturally attenuate. The Navy proposed No Further Remedial Action for Site 34 and the regulatory agencies concurred (USEPA letter 9/23/99; FDEP letter 9/8/00)."

13. **PSC and Site Status, Table 2, PSC 1:** Please update the site information comments to reflect the remedy re-evaluation ongoing.

Response: The Table text has been modified as follows: "Groundwater monitoring is to be conducted until concentrations are below standards; An Optimization Study was completed in 2005. An evaluation of the selected remedy is ongoing and a draft ESD was submitted to the regulatory agencies in 2011, however EPA has indicated that a ROD Amendment will be required."

14. **PSC and Site Status, Table 2, PSC 7:** The comments are different than the regulatory status of Table 1. The site has had a removal action though it is unclear whether the standards for the action were consistent with standards that may be applicable under remedial actions.

Response: The indicated remedial action was a "Time Critical" Removal Action completed to remove soils that exceeded the Preliminary Remediation Goals for the Contaminants of Concern as identified by Ensafe during the Site Characterization. Following excavation of soil confirmation sidewall and bottom samples were collected and compared to the Florida PRGs active at that time. Clean backfill was then placed on site and graded.

15. **PSC and Site Status, Table 2, PSC 10 and 18:** Please explain the difference between a "Completion Report" for PSC 10 and a PSCR. If this is the Removal Action Report, please explain whether the standards for the removal actions (at 10 and 18) are as protective as those required during a remedial action. This would include the potential need for land use controls.

Response: A "Time Critical" Removal Action was completed to remove soils that exceeded the Residential Preliminary Remediation Goals (PRGs) the Florida Residential Soil Cleanup Goals for

the Contaminants of Concern as identified by Ensafe during the Site Characterization. The removal action was documented in the "Project Completion Report Remediation Work at Various Sites Naval Air Station Pensacola Florida" completed by Bechtel Environmental, Inc. in November 1998. The Preliminary Site Characterization Reports (PSCR) were completed separately

16. **PSC and Site Status, Table 2, PSC 13 and 14:** Please explain the difference between the PSCRs and the Site Characterization Reports that appear to have been completed at different dates. If the SCR include sampling then this would suggest that other site with only PSCR did not include sampling and raises question of protectiveness of those sites. Please clarify.

Response: The correct document is the Preliminary Site Characterization Report. The table has been modified to reflect the correct document.

For PSC 13, the Preliminary Site Characterization Report was submitted to the regulatory agencies on September 1995 with a request for No Further Action. Regulatory approval of the No Further Action was finalized on August 14, 1996 (EPA concurrence letter 07/11/96; and FDEP approval 08/14/96).

For PSC 14, the Preliminary Site Characterization Report was submitted to the regulatory agencies on 11/17/95 with a request for No Further Action. Regulatory approval of the No Further Action was finalized on 07/09/97 (EPA concurrence letter 07/11/96; and FDEP approval 07/09/97).

Part 2: Review of the Exit Strategy (IR Site Detail Table)/ SMP/ and current schedule (9-14-12)

OU 1

Exit Strategy:

1. Please add a date to the comment field for the regulatory approval of the iron value.

Response: Regulatory approval of the iron value was initially granted during a NASP Partnering Team Meeting on March 17, 2009 when the following consensus item was adopted:

Consensus 04: The background data range for iron is adjusted to include wetlands 10, 12, 13 and 19a. The resulting two times the mean is 5,862µg/l, which will be used as the compliance criteria for OU1 Wetland Surface water.

On September 23, 2008 on behalf of the Navy Tetra Tech Inc. published the Final Technical Memorandum for the Reconnaissance Phase Flow Control Pilot Study for Operable Unit 1. The document specified" The recommended strategy is to establish a point of compliance (POC) in

Wetland 4D and to monitor iron concentrations in surface water at this POC. Based on Chapter 62-302.800, Florida Administrative Code (F.A.C.), the newly established site-specific value of the background range for salt water wetlands can be used as the alternative criterion for this POC. As calculated in Section 7.3., the background threshold is 5,862 µg/L, and this concentration is recommended as the alternative criterion.”

USEPA approved the draft final version of the document without comments via email on August 4, 2009 and FDEP approved the final document via letter on September 28, 2009.

The date will be added to the table.

Schedule

1. It is unclear why the Annual monitoring reports are being submitted 8 to 9 months after the calendar year ends. It would appear that the SMP is more appropriately scheduled.

Response: Submittal of the annual monitoring reports was delayed due to extended document reviews. The Navy has taken steps to correct the issue as is evidence in the SMP schedule.

2. It is also unclear why the baseline dates and the actual finish dates (for future tasks) are different. EPA will assume that the baseline dates are being revised for the new 2013 SMP.

Response: The baseline dates are date agreed to when the annual SMP is approved. Those dates are locked as the “baseline dates”. As schedule extensions are completed the actual finish dates are moved further into the future and reflect the current approved finish dates. When a new calendar year SMP (CY2013) is approved, a new baseline date is established.

3. The Draft FS is scheduled for Jan 2013 (See line 89). The Draft proposed plan should begin preparation thirty days after the Navy begins review of the regulatory comments on the draft FS (Line 91). This would tighten the schedule a bit by allowing the DF FS and the Draft PP to be submitted at the same time. The schedule appeared to accommodate this efficiency in the past but was not included in the current baseline schedule.

Response: Agreed the schedule has been modified to reflect the indicated change.

4. The same schedule layering should be considered for the PP-ROD, ROD-RD, and RD-RAWP.

Response: Agreed the schedule has been modified to reflect the indicated change.

SMP Milestones:

1. Revise per the comments above on the schedule.

Response: The SMP milestone schedule has been modified for the indicated changes.

OU 2

Exit Strategy:

1. The comment field suggests that only LTM is being completed while the remedy calls for MNA. Please revise.

Response: Agreed, the comment field has been modified to reflect MNA instead of LTM.

2. Site 12: There would appear to be a need for further excavations at Site 12. Please update with plan date for these excavations.

Response: Additional excavations are planned for Site 12 in late 2012 and early 2013. The table has been modified for the change

3. Site 27: Please explain the SS acronym

Response: The acronym "SS" stands for "Scoping Survey". The exit strategy has been updated.

4. Site 30: Please give an update on the status of the RASO investigations for Site 30.

Response: The Exit Strategy comments column for OU 2 , Site 30 has been updated as follow:
"RASO completed a RAD screening survey of surface soils in FY2011. Preliminary results indicated no exceedance of action levels for OU2. Soil hotspot excavations for CERCLA constituents will be completed after confirmation of RASO investigation results and partnering team concurrence on extent of step-out sampling. MNA for groundwater CERCLA contaminants."

Schedule:

1. Reflects Site 11, 12 and Site 30 excavations as being late. Is this due to Site 12 non-rad. and Site 30 RASO or some other reason? Please revise line 187 to make the date current and removal site 11 (since no further excavations will occur).

Response: The OU 2 excavation dates are shown as late because the baseline dates were set with the approval of final CY 2012 SMP. Since then the dates have been extended with regulatory approval by a Navy initiated Milestone Extension Request. The current approved schedule is shown in columns "Actual Start" and "Actual Finish". Site 11 has been removed from the text of Line 187.

2. It is also unclear why NA has been entered into the baseline figures. The site is being evaluated for cap thickness for soil cover and will need an FSA/PP.

Response: The baseline column indicates “NA” to represent “Not Available”. When the CY 2012 SMP was finalized this row was not present in the schedule and therefore a baseline date was not established. The Navy agrees that the site is being evaluated for cap thickness for soil cover and will need a Feasibility Study Addendum and Proposed Plan

3. The Public comment period (Line 199) would appear to be held during the finalization of the Proposed Plan and FSA (based on previous future dates). It will have to wait for the final proposed plan before starting. Please note that the Draft ROD does not have to wait for the public comment period. The incorporation of the public comments (Line 200) typically occurs during revised drafts or draft final phases.

Response: Agreed the schedule has been revised to start the Public comment period following submittal of the final Proposed Plan

4. Line 209: There is no public comment on the DF ROD.

Response: For line 209 the public comment period is from July 1, 2013 to July 30, 2013 as indicated in the “Actual Start” and “Actual Finish” columns. This is no date for the baseline columns because this was added following finalization of the CY2012 SMP.

5. Will there be need to revised the LUC RD to ensure that the LUC include no intrusive activities in the Site 11 area? I also wonder about an RD considering the need for additional work on the cover for Site 11. Drainage protection may be a key component considering the location near the shore. If we can make it protective with just an RAWP I’m game.

Response: Agreed, Revisions to the LUC RD maybe required based on the change in remedy and soil cover work at site 11. The revision will be discussed during upcoming NAS Pensacola Partnering Team meetings.

Milestones in 2013 SMP

1. Milestone dates will need to be revised to meet the questions above.

Response: The SMP milestone dates will be changed to reflect the comments above regarding the NAS Pensacola Exit Strategy and Gantt chart schedule.

OU 4

Exit Strategy:

1. The comments suggest that the year 2 plan was just completed. Seems we should have one plan for all 5 years adjusted appropriately. It is unclear from the schedule what year 2011 is; though it is likely Year 3 (Deduced from year 4 also being on the schedule). The exit strategy says year 4 is 2012. This comment field needs some clarity.

Response: The text in the comment field has been changed and no longer conflicts with the schedule and SMP.

2. The site also suggests LTM program when it should more like be MNA program.

Response: The text has been changed to reflect a “MNA” program for groundwater instead of “LTM”.

Schedule

1. This OU schedule appears to switch back to a fixed baseline un-modified by 2013 submittal. Reviewed the future actual dates for next milestones.

Response: Comment acknowledged.

SMP Milestones:

1. Year 4 would appear to be schedule for May 2013. However, there is a one year difference between the baseline date and the actual date. This makes unclear which report is being submitted in 2013 (Year 4 or Year 5). If year 4, then it would appear we’re behind schedule. Please clarify the three documents (Exit Strategy, Schedule and SMP).

Response: The terminology of Year 3 and Year 4 are misrepresentative of the actual events and have been deleted. The May 2013 submittal date for the draft document will document the groundwater sampling events completed on September 2012 (row 310) and March 2013 (row 312).

2. EPA is still awaiting the Navy submittal of an Interim RACR. Please add this to the SMP.

Response: The Interim RACR has been added to the schedule.

OU 11

Exit Strategy

1. There would appear to be some confusion in the dates in the additional comment field. Was the RD sent to the regulators in Nov 2010? If so, please correct the typo.

Response: Yes the original draft OU 11 Remedial Design was sent to the regulators on November 29, 2010. The comment text has been corrected for the typo.

Schedule

1. The Navy recently submitted a GW monitoring plan for OU 11. Is this the RAWP when combined with the UFP-SAP?

Response: Yes, the UFP SAP and Groundwater Monitoring Plan represent the Remedial Action Work Plan.

2. Are the LUC RD and the RD equivalent?

Response: Yes, the LUC RD and RD are equivalent.

3. The 2011 Monitoring report is not being schedule until 2013. Seems a title change would be appropriate to cover the periods of the sampling.

Response: Agreed the document title will be changed to 2013 to reflect the time period of actual sample collection.

4. The schedule concludes with a RACR but it is unclear from the Exit Strategy what is included in this RACR. Should it include GW then it would be interim. If for the soils then it should include the Removal action report.

Response: The OU 11 RACR will be an interim RACR including installation of the monitoring wells for the groundwater MNA program. All soil remedial activities have previously been completed. The schedule will be modified to indicate an "Interim RACR" will be completed.

SMP Milestones

1. Please update based on the comments above.

Response: The SMP milestone dates will be changed to reflect the comments above regarding the NAS Pensacola Exit Strategy and Gantt chart schedule.

OU 13

Exit Strategy

1. Please revise LTM nomenclature as the site should be reviewed through MNA parameters.

Response: The text has been changed to reflect a “MNA” program for groundwater instead of “LTM”.

Schedule

1. The schedule would appear to no longer include sampling events (NA in baseline sampling). If groundwater concentrations have not reached performance goals then monitoring should continue. The SMP appropriately includes additional sampling as does the future schedule.

Response: The baseline column indicates “NA” to represent “Not Available”. When the CY 2012 SMP was finalized this row was not present in the schedule and therefore a baseline date was not established. Continued groundwater monitoring is proposed as indicated by the dates in the “Actual Start” and “Actual Finish” columns.

SMP

1. Please include an interim RACR for this site.

Response: The Interim RACR has been added to the schedule.

OU 16

Exit Strategy

1. No comment

Schedule

1. Please begin the FS once the Draft RI has been commented on by the regulatory agencies. This will allow full internal deliberation and limit some of the extended schedules. The same should be true for the PP, ROD, and RAWP schedules.

Response: The Gantt chart schedule has been modified to reflect the changes to the schedule.

SMP

1. Once the schedule is revised as per the comments above, the SMP can be updated.

Response: The SMP will be updated as per the revised Gantt Chart schedule.

2. The date for submittal of the Draft RI is acceptable.

Response: Comment noted.

OU 18

Exit Strategy

1. The phase for OU18 for this OU should read RA.

Response: Agreed, the indicated change has been made.

2. Remedy is MNA for groundwater not LTM. Additional comments a bit dated, as well.

Response: Agreed, the comment field has been modified to reflect MNA instead of LTM. The comment field has been revised to state: "Partnering team engaged in a lengthy discussion and arrived at consensus in June 2012 on the feasibility of using SPLP analysis and XRF screening goals to determine leachability and direct exposure protectiveness. An Explosive Safety Submission required per DOD due to historic presence of munitions artifacts at the site was completed and submitted to NOSSA."

Schedule:

1. The RACR should be an interim report because of the GW concentrations remaining above cleanup goals.

Response: Agreed the document title has been changed to Interim Remedial Action Completion Report.

SMP:

1. No Comment

OU 19

Exit Strategy:

1. No Comment

Schedule:

1. The draft PP should be submitted with the DF FS, and draft ROD with the DF PP. The same may provide efficiencies for the RD and RAWP.

Response: The indicated change has been made.

2. There is also a need for a RACR (interim) for this site.

Response: An interim RACR has been added to the schedule.

SMP:

1. The Proposed Plan will likely be a 2013 milestone if submitted with the DF FS.

Response: Agreed, The SMP Milestone dates have been updated based on the revised Gantt Chart schedule.

2. Other dates can be adjusted accordingly.

Response: Agreed, The SMP Milestone dates have been updated based on the revised Gantt Chart schedule.

OU20 and OU 21

Exit Strategy:

1. Should be updated to reflect EPA's request to integrate these OUs into OU11.

Response: The Navy is still considering EPA's request and will decide whether to integrate OU 20 and 21 into OU 11 following the completion and evaluation of the data from the upcoming groundwater monitoring event.

Schedule:

1. Please integrate a line item for a technical memorandum that updates the groundwater concentrations and path forward for this site.

Response: Completion and review of the a technical memorandum document has been added to the schedule.

2. It is likely a revised draft of the proposed plan will be required should these OU's continue.

Response: A revised draft Proposed Plan will be added to the schedule.

3. Schedule efficiencies could be achieve by submitting draft final PP and Draft RODs at similar time frames. Other efficiencies post-ROD should also be considered.

Response: The Gantt Chart schedule has been modified to reflect changes to the schedule.

SMP:

1. Decision needed on OUs prior to review.

Response: The Navy is still considering EPA's request and will decide whether to integrate OU 20 and 21 into OU 11 following the completion and evaluation of the data from the upcoming groundwater monitoring event.

PSC 47

Exit Strategy:

1. Should be added to the IR Sites table.

Response: The Navy has decided not to create a new PSC and instead plans to schedule, fund and complete the Building 3221 investigation as part of the existing OU 19, Site 44 project. The Building 3221 investigation will be tracked on the Gantt Chart schedule, but will not be included in the NAS Pensacola Exit Strategy.

Schedule

1. Needs to be added.

Response: The Building 3221 investigation schedule will be added to the NAS Pensacola Gantt Chart Schedule.

SMP:

1. Please explain why characterization wouldn't start in 2013.

Response: PSC 47 will be removed from the SMP. The Navy has decided not to create a new PSC and instead plans to schedule, fund and complete the Building 3221 investigation as part of the existing OU 19, Site 44 project. The Building 3221 investigation will be tracked on the Gantt chart schedule, but will not be included in the NAS Pensacola SMP.

MMRP

Exit Strategy:

1. It would appear that there is more definition to the MMRP sites than presented in the exit strategy. It might be possible to separate the MMRP sites that are likely to go into an RI/FS from those that would not. Those with an RI might be listed separately.

Response: Agreed, The Pensacola MRP sites/AOCs were initially all combined within the site designation NAS Pensacola UXO-001. Following Site Inspection the MRP sites have been subdivided into:

UXO-001: Former Gun Ranges and Bombing Target

UXO-002: National Cemetery Gunnery Area

UXO-003: Bronson Skeet Range (this site is not included the FFA/SMP for NAS Pensacola).

Schedule:

1. Please submit the Draft PP with the Draft Final FS. The same should happen in subsequent phases like ROD and RAWP

Response: The Gantt Chart schedule has been modified to reflect changes to the schedule.

2. Please add the subsequent phases for the project (RD and RA).

Response: The subsequent phases have been added to the schedule.

SMP:

1. RI date in the schedule does not reflect the date in the SMP

Response: The documents have been revised for the corrected dates.

2. The same is true for the FS, Proposed Plan, ROD

Response: The documents have been revised for the corrected dates.

3. RD or RA should have proposed dates as appropriate.

Response: The documents were added to the SMP.

Additional comments received via Teleconference on December 3, 2012.

- Response to Comments document; response to comment 13, second sentence: The sentence does not make sense, please delete “with and insert “and”.

Response: the indicated change has been made the sentence now reads: “An evaluation of the selected remedy is ongoing and a draft ESD was submitted to the regulatory agencies in 2011, however EPA has indicated that a ROD Amendment will be required.”

- Response to Comments document; response to comment 15: Was the removal action and NFA based on residential or industrial cleanup goals? If industrial goals then a LUC may be required.

Response: The removal action completed by Bechtel removed all soils exceeding the residential PRG and Florida Soil Cleanup goals. The response to comments has been revised as follows: “A “Time Critical” Removal Action was completed to remove soils that exceeded the Residential Preliminary Remediation Goals (PRGs) the Florida Residential Soil Cleanup Goals for the Contaminants of Concern as identified by Ensafe during the Site Characterization. The removal action was documented in the “Project Completion Report Remediation Work at Various Sites Naval Air Station Pensacola Florida” completed by Bechtel Environmental, Inc. in November 1998. The Preliminary Site Characterization Reports (PSCR) were completed separately.” Table 2 in final SMP has also been revised.

- Gantt chart; line 143 Submit Draft Remedial Action Work Plan, Sun 6/22/14: Please add this document to the SMP Table A-1.

Response: the indicated change has been made.

- Gantt chart; line 156 Submit Draft Remedial Action Completion Report, Sat 10/31/15: Please add this document to the SMP Table A-1.

Response: the indicated change has been made.

- Gantt chart; line 220 Public Comment: Please delete this row.

Response: the indicated change has been made.